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April 11, 2013

**Via Electronic Submission**

*Ex parte*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Portals II, Room TW-A325  
Washington, DC 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200, GN Docket No. 13-5;  
*Petition for Declaratory Ruling That tw telecom inc. Has the Right to Direct IP-to-IP Interconnection Pursuant to Section 251(c)(2) of the Communications Act, as Amended, for the Transmission and Routing of tw telecom's Facilities-Based VoIP Services and IP-in-the-Middle Voice Services*, WC Docket No. 11-119;  
*AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353; and  
*Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92

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Dear Ms. Dortch:

On April 10, 2013, William Brown, Bob Quinn and the undersigned of AT&T Services, Inc. (AT&T) met with Nicholas Degani, Wireline Legal Advisor for Commissioner Ajit Pai regarding the above-listed proceedings. The attached document was distributed during the course of the discussion.

AT&T reiterated its continuing support for Vonage's waiver request. With respect to the anticipated Commission Order, NPRM and NOI on facilitating direct access to numbers for IP-based providers,<sup>1</sup> AT&T recommended that the Commission focus on key attributes of an end-state, as well as how to transition to that end-state.

AT&T also proposed a number of questions that it believes would be useful for the Commission to seek comment upon in its forthcoming NPRM, including:

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<sup>1</sup> See FCC News Release, "FCC Announces Tentative Agenda for April Open Meeting," released March 28, 2013.

- Should IP-based providers be:
  - required to establish LRNs for each LATA?
  - expected to ensure connectivity to all other telephone number users as a condition of having direct access to numbers?
  - allowed to receive numbers in smaller quantities than NXXs or thousands-blocks?
  - required to obtain some form of authorization other than a certification or license, as a prerequisite to receiving telephone numbers?
  - required to establish TDM interconnection or should the obligation be on TDM providers?
- Should the geographic basis of numbers be eliminated or broadened?
  - What effects would this have upon the Commission's ICC transition?
- What database or databases should be used for IP-routing?
- During any transition, should the database of record hold both TDM and IP routing information?

Pursuant to Section 1.1206 of the Commission's rules, this ex parte notice is being filed electronically for inclusion in the record of the above-referenced proceeding. Please contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Henry Hultquist', with a stylized, flowing script.

Henry Hultquist  
VP Federal Regulatory

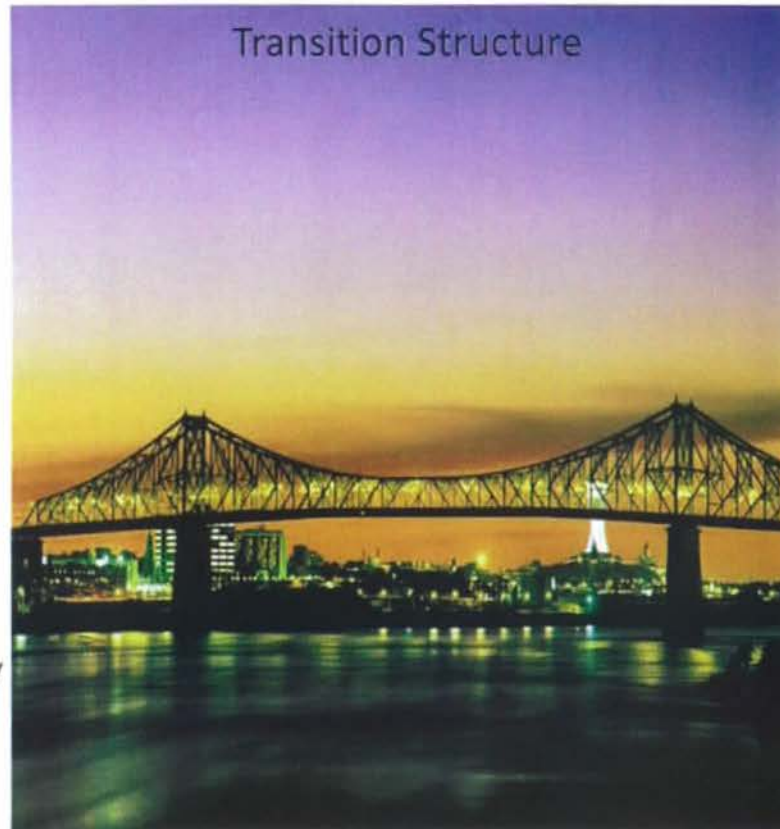
Attachment

cc: Nicholas Degani

# Numbering Transition – Structures to Change

## Current Structure

- LERG/LNP Routing
- Certification/Licensing
- NXX or NXX-X Number Assignment
- TDM Interconnection-only
- Rate Center Assignment
- LATA Porting Limits



## Future Structure

- IP Routing
- Authorization
- Individual Number Assignment
- IP Interconnection-only
- Non-geographic Assignment
- Eliminate LATAs

